IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

Case No. 2:23-cv-4102

- - -

DEREK J. MYERS, ET AL.,

plaintiffs,

V.

PIKE COUNTY, ET AL.,

defendants.

DEPOSITION OF JAMES BURCHETT

The deposition of James Burchett was taken on Thursday, August 29th, 2024, at 11:52 a.m., at the Pike County Government Center, 230 Waverly Plaza, Waverly, Ohio.

Case: 2:23-cv-04102-MHW-EPD Doc #: 29 Filed: 11/06/24 Page: 2 of 6 PAGEID #: 244 James Burchett August 29, 2024

1	ON BEHALF OF THE PLAINTIFFS:	1	Pa	age 3
2	Marc D. Mezibov, Esquire (via Zoom)	2	EXAMINATION	PAGE
	Mezibov Butler	3	Mr. Mezibov	4
3	615 Elsinore Place, Suite 105	4	MI. MEZIDOV	
4	Cincinnati, Ohio 45202 mmezibov@mezibov.com	5		
5	Emmett E. Robinson, Esquire	6		
	Robinson Law Firm LLC		EXHIBITS	PAGE
6	6600 Lorain Avenue, Suite 731	7	EARITOTIO	FAGE
7	Cleveland, Ohio 44102 erobinson@robinsonlegal.org	′	None	
8	erobinsonerobinsonregar.org	8	None	
9		9		
	ON BEHALF OF THE DEFENDANTS:	10		
10	Cassaundra L. Sark, Esquire	11		
11	Lambert Law Office, LLC	111	Change were have be Change in the	18
	215 South 4th Street	1.0	Stenographer's Certificate	18
12	Ironton, Ohio 45638	12		
13	csark@lambert-law.org	14		
14				
15		15		
	ALSO PRESENT:			
16	Derek Myers (via Zoom)	17		
17	Selen Myelb (via 200m)	18		
18		20		
19				
20 21		21		
		22		
22		22		
		23		
22		23 24		
22 23	Page 4		Pa	age !
22 23	Page 4 JAMES BURCHETT,		Pa asking the questions. And I'll tell you I don't	
22 23 24	_	24		
22 23 24	JAMES BURCHETT,	24	asking the questions. And I'll tell you I don't	t
22 23 24 1 2	JAMES BURCHETT, being by me first duly sworn, as hereinafter	1 2	asking the questions. And I'll tell you I don't think we're going to be here too terribly long.	the
22 23 24 1 2 3 4	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION	1 2 3	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such.	the
22 23 24 1 2 3 4 5	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov:	1 2 3 4 5	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you.	the But
22 23 24 1 2 3 4 5 6	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows:	1 2 3 4 5 6	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you expected the strength of the str	the But
1 2 3 4 5 6 7	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it?	1 2 3 4 5 6 7	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you en been deposed before?	the But
1 2 3 4 5 6 7 8	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it? A. It is Burchett. It's Burchett.	1 2 3 4 5 6 7 8	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you expected before? A. Yes. I have.	the But ver
22 23 24 1 2 3 4 5 6 7	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it?	1 2 3 4 5 6 7	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you en been deposed before?	the But ver
1 2 3 4 5 6 7 8	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it? A. It is Burchett. It's Burchett.	1 2 3 4 5 6 7 8	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you expected before? A. Yes. I have.	the But ver
1 2 3 4 5 6 7 8	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it? A. It is Burchett. It's Burchett. Q. Burchett?	1 2 3 4 5 6 7 8 9	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you expected before? A. Yes. I have. Q. All right. My guess is this will so	the But ver
1 2 3 4 5 6 7 8 9	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it? A. It is Burchett. It's Burchett. Q. Burchett? A. Yeah. Burchett.	1 2 3 4 5 6 7 8 9	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you en been deposed before? A. Yes. I have. Q. All right. My guess is this will so familiar to you. And we'll follow probably the	the But ver
1 2 3 4 5 6 7 8 9 10 11	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it? A. It is Burchett. It's Burchett. Q. Burchett? A. Yeah. Burchett. MR. ROBINSON: Burchett.	1 2 3 4 5 6 7 8 9 10 11	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you expended before? A. Yes. I have. Q. All right. My guess is this will so familiar to you. And we'll follow probably the format that was followed in your previous expersion going to be asking you questions. And I don't	the But ver
1 2 3 4 5 6 7 8 9 10 11 12 13	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it? A. It is Burchett. It's Burchett. Q. Burchett? A. Yeah. Burchett. MR. ROBINSON: Burchett. Q. And how do I address you? Do I call you deputy chief? Do I call you chief?	1 2 3 4 5 6 7 8 9 10 11 12 13	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you expended before? A. Yes. I have. Q. All right. My guess is this will so familiar to you. And we'll follow probably the format that was followed in your previous expersions to be asking you questions. And I don't want you to guess at what I'm asking you.	the But ver ound same ience
1 2 3 4 5 6 7 8 9 10 11 12 13 14	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it? A. It is Burchett. It's Burchett. Q. Burchett? A. Yeah. Burchett. MR. ROBINSON: Burchett. Q. And how do I address you? Do I call you deputy chief? Do I call you chief? A. You can just address me as Jim if you	1 2 3 4 5 6 7 8 9 10 11 12 13 14	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you en been deposed before? A. Yes. I have. Q. All right. My guess is this will so familiar to you. And we'll follow probably the format that was followed in your previous expersion going to be asking you questions. And I don want you to guess at what I'm asking you. Okay. So if my questions are problem	the But But same sience n't ematic
1 2 3 4 5 6 7 8 8 9 10 11 12 13 14 15	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it? A. It is Burchett. It's Burchett. Q. Burchett? A. Yeah. Burchett. MR. ROBINSON: Burchett. Q. And how do I address you? Do I call you deputy chief? Do I call you chief? A. You can just address me as Jim if you want to.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you expended before? A. Yes. I have. Q. All right. My guess is this will so familiar to you. And we'll follow probably the format that was followed in your previous expersions that was followed in your previous expersions to be asking you questions. And I do want you to guess at what I'm asking you. Okay. So if my questions are problem for any reason, you don't understand what I'm asking you.	t the But Same same ience n't
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it? A. It is Burchett. It's Burchett. Q. Burchett? A. Yeah. Burchett. MR. ROBINSON: Burchett. Q. And how do I address you? Do I call you deputy chief? Do I call you chief? A. You can just address me as Jim if you want to. Q. No. No. You're entitled to better than	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you expected been deposed before? A. Yes. I have. Q. All right. My guess is this will so familiar to you. And we'll follow probably the format that was followed in your previous expert I'm going to be asking you questions. And I don want you to guess at what I'm asking you. Okay. So if my questions are proble for any reason, you don't understand what I'm ask you, I use a word that's unfamiliar or improperti	the But ver ound same ience on't ematic sking ly
1 2 3 4 5 6 7 8 8 9 10 11 12 13 14 15	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it? A. It is Burchett. It's Burchett. Q. Burchett? A. Yeah. Burchett. MR. ROBINSON: Burchett. Q. And how do I address you? Do I call you deputy chief? Do I call you chief? A. You can just address me as Jim if you want to.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you expended before? A. Yes. I have. Q. All right. My guess is this will so familiar to you. And we'll follow probably the format that was followed in your previous expersions that was followed in your previous expersions to be asking you questions. And I do want you to guess at what I'm asking you. Okay. So if my questions are problem for any reason, you don't understand what I'm asking you.	the But ver ound same ience on't ematic sking ly
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it? A. It is Burchett. It's Burchett. Q. Burchett? A. Yeah. Burchett. MR. ROBINSON: Burchett. Q. And how do I address you? Do I call you deputy chief? Do I call you chief? A. You can just address me as Jim if you want to. Q. No. No. You're entitled to better than	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you expected been deposed before? A. Yes. I have. Q. All right. My guess is this will so familiar to you. And we'll follow probably the format that was followed in your previous expert I'm going to be asking you questions. And I don want you to guess at what I'm asking you. Okay. So if my questions are proble for any reason, you don't understand what I'm ask you, I use a word that's unfamiliar or improperti	the But Same same same same same ematic
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it? A. It is Burchett. It's Burchett. Q. Burchett? A. Yeah. Burchett. MR. ROBINSON: Burchett. Q. And how do I address you? Do I call you deputy chief? Do I call you chief? A. You can just address me as Jim if you want to. Q. No. No. You're entitled to better than that.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you en been deposed before? A. Yes. I have. Q. All right. My guess is this will so familiar to you. And we'll follow probably the format that was followed in your previous exper: I'm going to be asking you questions. And I don want you to guess at what I'm asking you. Okay. So if my questions are proble for any reason, you don't understand what I'm as you, I use a word that's unfamiliar or improper: used or I garble my words or make the thing for	t the But But ound same ience n't ematic
22 23 24 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it? A. It is Burchett. It's Burchett. Q. Burchett? A. Yeah. Burchett. MR. ROBINSON: Burchett. Q. And how do I address you? Do I call you deputy chief? Do I call you chief? A. You can just address me as Jim if you want to. Q. No. No. You're entitled to better than that. A. Well, my title is captain.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you expended before? A. Yes. I have. Q. All right. My guess is this will so familiar to you. And we'll follow probably the format that was followed in your previous expersion going to be asking you questions. And I don't want you to guess at what I'm asking you. Okay. So if my questions are proble for any reason, you don't understand what I'm ask you, I use a word that's unfamiliar or impropersused or I garble my words or make the thing for complex than it need be, tell me that. Okay.	the But Same ience on't ematically I'm ant to
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it? A. It is Burchett. It's Burchett. Q. Burchett? A. Yeah. Burchett. MR. ROBINSON: Burchett. Q. And how do I address you? Do I call you deputy chief? Do I call you chief? A. You can just address me as Jim if you want to. Q. No. No. You're entitled to better than that. A. Well, my title is captain. Q. Captain? A. Yes, sir.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you expected been deposed before? A. Yes. I have. Q. All right. My guess is this will so familiar to you. And we'll follow probably the format that was followed in your previous expert I'm going to be asking you questions. And I don want you to guess at what I'm asking you. Okay. So if my questions are proble for any reason, you don't understand what I'm ask you, I use a word that's unfamiliar or impropertused or I garble my words or make the thing for complex than it need be, tell me that. Okay. I not trying to confuse you or trick you. I do we	the But Same ience on't ematic sking
22 23 24 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it? A. It is Burchett. It's Burchett. Q. Burchett? A. Yeah. Burchett. MR. ROBINSON: Burchett. Q. And how do I address you? Do I call you deputy chief? Do I call you chief? A. You can just address me as Jim if you want to. Q. No. No. You're entitled to better than that. A. Well, my title is captain. Q. Captain? A. Yes, sir. Q. All right. Captain. Captain, my name is	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you end been deposed before? A. Yes. I have. Q. All right. My guess is this will so familiar to you. And we'll follow probably the format that was followed in your previous expersion you to guess at what I'm asking you. Okay. So if my questions are proble for any reason, you don't understand what I'm ask you, I use a word that's unfamiliar or impropersused or I garble my words or make the thing for complex than it need be, tell me that. Okay. I do we get your answers as accurately as I can. Okay? A. Okay.	t the But Surver Surver Surver Surver Surver Surver Surver Surver Survey
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it? A. It is Burchett. It's Burchett. Q. Burchett? A. Yeah. Burchett. MR. ROBINSON: Burchett. Q. And how do I address you? Do I call you deputy chief? Do I call you chief? A. You can just address me as Jim if you want to. Q. No. No. You're entitled to better than that. A. Well, my title is captain. Q. Captain? A. Yes, sir. Q. All right. Captain. Captain, my name is Marc Mezibov. I'm the one asking you the questions.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you expended before? A. Yes. I have. Q. All right. My guess is this will so familiar to you. And we'll follow probably the format that was followed in your previous expert I'm going to be asking you questions. And I don want you to guess at what I'm asking you. Okay. So if my questions are proble for any reason, you don't understand what I'm as you, I use a word that's unfamiliar or impropertused or I garble my words or make the thing for complex than it need be, tell me that. Okay. Inot trying to confuse you or trick you. I do we get your answers as accurately as I can. Okay? A. Okay. Q. All right. Let me finish my questions.	the But ver ound same ience. n't ematic sking ly I'm ant to
22 23 24 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	JAMES BURCHETT, being by me first duly sworn, as hereinafter certified, deposes and says as follows: EXAMINATION By Mr. Mezibov: Q. Good morning. You are James is it Burchett or Burchett? How do I pronounce it? A. It is Burchett. It's Burchett. Q. Burchett? A. Yeah. Burchett. MR. ROBINSON: Burchett. Q. And how do I address you? Do I call you deputy chief? Do I call you chief? A. You can just address me as Jim if you want to. Q. No. No. You're entitled to better than that. A. Well, my title is captain. Q. Captain? A. Yes, sir. Q. All right. Captain. Captain, my name is	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	asking the questions. And I'll tell you I don't think we're going to be here too terribly long. Because I think we got a lot of stuff done with sheriff before you identifying papers and such. I do have questions of you. So let me ask you this: Have you end been deposed before? A. Yes. I have. Q. All right. My guess is this will so familiar to you. And we'll follow probably the format that was followed in your previous expersion you to guess at what I'm asking you. Okay. So if my questions are proble for any reason, you don't understand what I'm ask you, I use a word that's unfamiliar or impropersused or I garble my words or make the thing for complex than it need be, tell me that. Okay. I do we get your answers as accurately as I can. Okay? A. Okay.	the But ver ound same ience. n't ematic sking ly I'm ant to on r your

1 we do that is that we don't make it contains for Ray 2 as the court resporter. So wants to get everything 3 doan as accurately and as completely as possible. So 4 if we don't talk over one another, that will go a 5 long way to accomplish that fact accomplish that 6 goal. Okay? 7 A. I'm ready. 8 Q. All right. Answer, please, all my 9 questions audibly not simply by a nod of the head so 1 that Kay knows what you're saying. All right? 11 A. I'm saiting. 12 Q. Most's that? 12 Q. Most's that? 13 A. I said I'm waiting. 14 Q. You're waiting? 15 A. Yes, air. I'm ready. 16 Q. All right. Here's my question. Are you 17 employed? 18 A. Pen, air. I am. 19 Q. By whom? 19 Q. Not be long have you been employed by 10 A. Delto Coursy Sheriff's Office. 10 Q. And how long have you been employed by 11 the Sheriff himself? 12 A. Lat's see. September the 2nd of this 13 the sheriff himself? 14 A. Off course. Yes. 15 Q. Most is that we were nowed invention on the Speak over you. 16 Q. The same courseftly working. 17 A. Plus Gourney Sheriff's Department? 18 A. Off course. Yes. 19 Q. Most of discuss coases that we were working on. Or 19 just to discuss scases that we were working on. 20 Q. We have — I'm sorry. I didn't sean to 21 gashibit. 7, which I'm agoing to ask Breat't to which the sheriff's office is 22 C. What is this? 23 A. Lat's see. September the 2nd of this 24 A. Off course. Yes. 25 Q. How and under what circumstances? 26 A. Well, this is a containty things. 27 Q. And did you ever have direct contact with the sheriff in specific is 28 A. Well, book when the Sheriff's office is 29 C. What is this? 29 A. Well, book when the Sheriff's office is 29 C. What is this? 29 A. Well, this is a containty — it lays out my 20 A. No. Not really. I didn't approve of that type of relationship. 20 Gkey, Nod it says you supervise all form to do you. Save you seen stability 7 previously? 20 A. Not really. I didn't approve of that type of relationship. 21 A. Not really. I didn't approve of that type of relationship. 22 A. Not really. I didn't		Page 6		Page 7
down as accurately and as complacely as possible. So if we don't talk over one another, that will go a five don't talk over one another, that will go a long way to accomplish that fact — accomplish that goal. (Kay? A. I'm ready. O. All right. Answer, please, all my goastions suitinly not simply by a not of the head so destinant suitinly not simply by a not of the head so that Kay knows what your eaying. All right? A. I'm waiting. O. Man's that? A. I said I'm waiting. A. I said I'm waiting. A. I said I'm waiting. A. Yes, sir. I'm ready. O. All right. Here's my question. Are you manually and any property of the courts who I serve. A. My immediate supervisor right now is our chief deputy. Christopher Jones. O. And of did you report to a gentlessan named Dixor? A. Let's see. September the 2nd of this the heart thimself? A. Let's see. September the 2nd of this the heart thimself? A. A. Let's see. September the 2nd of this the sheriff timmelf? A. Mell, this pas changed since this Leasuit the sheriff timmelf? A. Well, was that we were currently working. C. And did you ever have direct contact with the sheriff timmelf? A. Well, was all the way would you report to a gentlessan maned Dixor? A. Well, this has changed since this Leasuit bas been filed. My role at the sheriff's office is A. Well, this has changed since this Leasuit bas been filed. My role at the sheriff's office is A. Yes, Charlie Reeder was sheriff, he wanced as the wet things. A. Well, this is actually — it lays out my A. Well, this is actually. I didn't approve of has been filed. My role at the sheriff's office is that correct? A. Well, this is actually. I didn't approve of has been filed. My role at the sheriff's office is that correct? A. Well, this is actually and meet couple times G. Ckay. So you know Wr. Myers a and work closely with him. Q. Ckay. So you know Wr. Myers a and work closely with him. Q. Ckay. Did you ever, in your professional capacity, have are general and interested in. A. Wes. I	1	<u> </u>	1	
4 if we don't talk over one another, that will go a 5 long wey to accomplish that fact — accomplish that 6 geal. Glory 7 A. I'm ready. 8 Q. All right. Answer, please, all my 9 questions suitibly not simply by a nod of the head ac 10 that Kay knows what you're saying. All right? 11 A. I'm waiting. 12 Q. Wat's that? 13 A. I said I'm waiting. 14 Q. You're waiting? 15 A. Yes, sir. I'm ready. 16 Q. All right. Bere's my question. Are you 17 employed? 18 A. Yes, sir. I'm ready. 19 Q. By when? 19 Q. And how long have you been employed by 20 the Pike County Sheriff's Office. 21 Q. And how long have you been employed by 22 the Pike County Sheriff's Department? 23 A. Let's see. Signether the And of this 24 year, I'll be going into my 18th year, I do believe. 25 Q. And did you ever have direct contact with 3 the sheriff himself? 4 A. Of course. Yes. 5 Q. Bow and under shat circumstances? 6 A. Well, we usually would meet couple times 7 a week to discuss general things that were howing no. Or 19 just to discusse general things that were howing no. Or 19 just to discusse general things that were howing no. Or 19 just to discusse general things that were howing no. Or 19 just to discusse general things that were howing no. Or 19 just to discusse general things that were howing no. Or 19 just to discusse general things that were howing no. Or 19 just to discusse general things that were howing no. Or 19 just to discusse general things that were not	2	as the court reporter. She wants to get everything	2	A. I'm not a chief deputy. I'm a captain.
5 long way to accomplish that fact — accomplish that 6 goal. Okay?	3	down as accurately and as completely as possible. So	3	Q. Oh, you're captain. I'm sorry.
6 goal. Okay? 7 A. I'm ready. 8 Q. All right. Answer, please, all my 9 questions audibly not simply by a nod of the head so 10 that Kay knows what you're saying. All right? 11 A. I'm waiting. 12 Q. What's that? 13 A. I and I'm vaiting. 14 Q. You're waiting? 15 A. Yes, sir. I'm ready. 16 Q. All right. Escre's my question. Are you 17 employed? 18 A. Yes, sir. I im ready. 19 Q. By whom? 19 Q. By whom? 19 Q. By whom? 19 Q. By whom? 20 A. Pike County Sheriff's Office. 21 Q. And how long have you been employed by 22 the Pike County Sheriff's Department? 23 A. Let's see. Segrember the 2nd of this 24 year, I'll be going into my 18th year, I do believe. 25 A. Mell, we usually would meet couplet times 26 A. Well, we usually would meet couplet times 27 a week to discuss cases that we were working on. Or 28 just to discuss general things that were happening 9 around the office — administrative things. 10 Q. We have — I'm sorry. I didn't mean to 11 speak over you. 12 We have marked a donment earlier as 13 Excibit?, which I'm going to ask Demet to put in 14 front of you. Have you seen Exhibit? previously? 15 A. Yes. Yes. I have. 16 Q. Okay. Med it style you sequence all 17 front of you. Have you seen Exhibit? previously? 18 A. Well, this is actually — it lays out my 18 job description. 19 Q. Okay. Med it says you supervise all 20 A. Not really. I didn't sprove of 21 A. Not really. I didn't sprove of 22 A. Not exactly every function. But pretty 23 M. O. Okay. Med i says you supervised 24 A. Okay. 25 O. Okay. Wait i says you supervise all 26 functions of the sheriff's office: is that correct? 27 A. Not cascally every function. But pretty 28 much so, yes. 29 O. Okay. Wait intercions are not supervised 20 O. Okay. Wait intercions are not supervised 21 A. Okay.	4	if we don't talk over one another, that will go a	4	A. Yes, sir.
7 A. I'm ready. 8 Q. All right. Answer, please, all my questions audibly not simply by a not of the head so 10 that Kay knows what you're eaying. All right? 11 A. I'm waiting. 12 Q. What's that? 13 A. I said I'm waiting. 14 Q. You're waiting? 15 A. Yes, sir. I'm ready. 16 Q. All right. Bere's my question. Are you 17 employed? 18 A. Yes, sir. I am. 19 Q. By whon? 10 A. Pike County Sheriff's Office. 20 A. A Disc County Sheriff's Department? 21 A. Isa'te's ase. September the 2nd of this 24 year. I'll be going into my 18th year, I do believe. Page 8 C. All value was chart you ever have direct contact with the sheriff himself? 2 A. Well, I report to my sheriff, and I also report to the courts who I serve. 2 A. A Discovery Sheriff's Department? 2 A. Well, I report to my sheriff, and I also report to the courts were reported. 3 A. Well, I report to my sheriff, and I also report to the courts were report. 4 A. Well, I report to my sheriff, and I also report to the courts were report. 5 C. Ard some time, did you report as captain? 6 A. Well, I report to my sheriff, and I also report to the courts who I serve. 1 A. Well, I report to my sheriff, and I also report to the courts who I serve. 1 C. Ard for the feet's my question. Are you immediate supervisor right now is our clied dequy, Christopher Jones. 1 Q. And I say if mediate supervisor right now is our clied dequy, Christopher Jones. 1 Q. And the whole of phone of the feet's pearling and the phone of the partier way up until about a year ago. Until his departure. 2 Q. Glay. And in what way would you report to Mr. Dixon? 2 A. Well, this has changed since this lawsuit to Mr. Dixon? 3 A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? 4 A. Of course. Yes. 5 Q. We have "I'm sorry. I didn't mean to 11 speak you will be a partner up with Mr. Myers? 2 A. Well, back when Carlie Reader's countin, I do believe. 3 A. Well, this is actually — it lays out my job description. 4 A. Well, thi	5	long way to accomplish that fact accomplish that	5	Q. How long have you been a captain?
8 Q. All right. Answer, please, all my 9 questions audibly not simply by a nod of the head so 10 that Kay knows what you're saying. All right? 11 A. I'm waiting. 12 Q. What's that? 12 Q. What's that? 13 A. I said 'I'm waiting. 14 Q. You're waiting? 15 A. Yes, sir. I'm ready. 16 Q. All right. Bere's my question. Are you 17 employed? 18 A. Yes, sir. I am. 19 Q. Sy whom? 20 A. Pike County Sheriff's Office. 21 Q. Rad how long have you been employed by 22 the Pike County Sheriff's Department? 23 A. Lat's see. September the 2nd of this 24 year, I'll be going into my 18th year, I do believe. 1 Cases that we were currently working. 2 Q. And did you ever have direct contact with 3 the sheriff himself? 4 A. Of course. Yes. 5 Q. Enn and under what circumstances? 6 A. Well, we usually would neet couple times 7 a week to discuss general things that were harpening 9 around the office — administrative things. 10 Q. We have — I'm sorry. I didn't mean to 11 speak over you. 12 Exhibit 7, which 're going to ask Emmet to put in 14 Front of you. Have you seen Exhibit 7 previously? 15 A. Yes, Yes, I have. 16 Q. Okay. And it says you supervise all 17 A. Well, this is actually — it lays out my 18 job description. 19 Q. Okay. And it says you supervise all 20 Q. Okay. What functions are not supervised 21 A. Not really. 22 C. All right. Beref my 23 A. Neil, this is actually — it lays out my 24 bid before specimen. 25 Q. Okay. And it says you supervise all 26 functions of the sheriff's office is that correct? 27 A. Not really. 28 A. Well, this is actually — it lays out my 29 gib description. 29 Q. Okay. And it says you supervise all 20 Q. Okay. And it says you supervise all 21 functions of the sheriff's office is that correct? 22 A. Not ceacely every function. But pretty 23 much so, yes. 24 Q. Okay. What functions are not supervised 25 Q. Okay. What functions are not supervised 26 A. Not course. 27 A. Not really. I didn't emprove of 28 A. Yes, I did during the Rhoden Gilley 29 hours of relationship. 29 Q. Okay. And it says you supervise	6	goal. Okay?	6	A. I'm going to say off the top of my head
guestions audibly not simply by a nod of the head so that Kay knows what you're saying. All right? 11 A. I'm waiting. 12 Q. Mhat's that? 13 A. I said I'm waiting. 14 Q. You're waiting? 15 A. Yes, sir. I'm ready. 16 Q. All right. Here's my question. Are you in employed? 17 employed? 18 A. Yes, sir. I am. 19 Q. By whom? 20 A. Pike County Sheriff's Office. 21 Q. And how long have you been employed by the Pike County Sheriff's Department? 22 A. Let's see. September the 2nd of this the sheriff himself? 23 A. Mill sight of were have direct contact with the sheriff himself? 24 year, I'll be going into my 18th year, I do believe. 25 A. Well, I report to my sheriff, and I also report to the courts who I serve. 26 Q. And I say "report." I mean, who's your immediate supervisor? if mean, who's your immediate supervisor? 27 A. Yes, sir. I am. 28 A. Yes, sir. I am. 29 A. Yes, sir. I imm. 20 A. Pike County Sheriff's Office. 20 And how long have you been employed by the Pike County Sheriff's Department? 21 Q. And did you ever have direct contact with the sheriff himself? 22 Q. And did you ever have direct contact with the sheriff himself? 29 A. Well, I report to the courts who I serve. 20 A. My as maintact supervisor? 20 A. Wen was that? 21 Q. And the way up until about a year ago. Until his departure. 22 Q. Glay. And in what way would you report to to Man. Dixon? 23 A. Let's see. September the 2nd of this to Page 8 1 cases that we were currently working. 2 Q. And did you ever have direct contact with the sheriff's incompany working. 3 A. Well, I his has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? 4 A. Yes, sir. I did. 5 A. Well A whore Marked a document earlier as sheriff's he wanted me to partner up with Mr. Myers and work closely with him. 2 Q. Glay. Supe. I'm talking about do you know our client, Derek Myers? 3 A. Well, Treport to the courts who is our client. Developer year of the way up until about a ye	7	A. I'm ready.	7	probably about five, six years.
that Kay knows what you're saying. All right? 11 A. I'm waiting. 12 Q. What's that? 13 A. I said I'm waiting. 14 Q. You're waiting. 15 A. Yes, sir. I'm ready. 16 Q. All right. Here's my question. Are you immediate supervisor? 17 employed? 18 A. Yes, sir. I am. 19 Q. By whon? 20 A. Pike County Sheriff's Office. 21 Q. And how long have you been employed by 21 the Pike County Sheriff's Department? 22 A. Let's see. September the 2nd of this 22 year, I'll be going into my 18th year, I do believe. 23 A. Let's see. September the 2nd of this 3 the sheriff himself? 24 A. Of course. Yes. 5 Q. Mo and under what circumstances? 6 A. Well, we usually would meet couple times 7 a week to discuss cases that we were working on. Or 8 just to discuss general things that were happening around the office — administrative things. 10 Q. We have — I'm sorry. I didn't mean to 11 speak over you. 21 We have marked a document earlier as 13 Ebhibit 7, which I'm going to ask Emmett to put in 14 front of you. Have you seen Eshibit 7 previously? 15 A. Yes. Yes. I have. 16 Q. Want is this? 17 A. Well, this is actually — it lays out my 18 job description. 28 Q. Gkay. So you knew Mr. Myers? 29 A. Well, this is actually — it lays out my 18 job description. 20 Q. Okay. Mitat functions are not supervised 20 Lighth to course on him? 21 A. Not exactly every function. But pretty 21 much so, yes. 22 Q. Okay. What functions are not supervised 21 in. 23 A. Not exactly every function. But pretty 22 much so, yes. 24 A. Okay. 25 A. Well, this is actually — it lays out my 18 job description. 26 A. Well, this is actually — it lays out my 18 job description. 27 A. Well, this is actually — it lays out my 18 job description. 28 A. Well, this is actually — it lays out my 18 job description. 29 A. Well at the sheriff's office is in that course the sheriff's what I'm interested in. 29 A. Well is this in interested in. 20 A. Well I she courty sheriff is office is in that course the sheriff's office is in that course the sheriff's of	8	Q. All right. Answer, please, all my	8	Q. Okay. And to whom do you report as
11	9	questions audibly not simply by a nod of the head so	9	captain?
12 Q. What's that? 13 A. I said I'm waiting. 14 Q. You're waiting? 15 A. Yes, sir. I'm ready. 16 Q. All right. Here's my question. Are you 17 employed? 18 A. Yes, sir. I am. 19 Q. By whom? 20 A. Pike Courty Sheriff's Office. 21 Q. And how long have you been employed by 22 the Pike Courty Sheriff's Department? 23 A. Let's see. September the 2nd of this 24 year, I'll be going into my 18th year, I do believe. Page 8 1 cases that we were currently working. 2 Q. And did you ever have direct contact with 3 the sheriff himself? 4 A. Of course. Yes. 5 Q. Bow and under what circumstances? 6 A. Well, we usually would meet couple times 7 a week to discuss general things that were happening 9 around the office administrative things. 10 Q. What is this? 11 We have marked a document earlier as 12 Bohibit 7, which I'm going to ask Emmet to put in 14 front of you. Have you seen Edubit 7 previously? 15 A. Yes. Yes. I have. 16 Q. What is this? 17 A. Well, this is actually it lays out my 18 job description. 19 Q. Okay. And it says you supervise all 20 Q. Okay. Must functions are not supervised 21 Q. Okay. What functions are not supervised 22 Q. Okay. What functions are not supervised 23 A. Let's see. September the 2nd of this 24 year, I'll be going into my 18th year, I do believe. Page 9 A. Well, his has changed since this laweuit 15 A. Yes. Charlie Reeder's cousin, I do 16 believe. Yes. I know him. 26 Q. Okay. So you know Mr. Myers? 27 A. Nell, back when Charlie Reeder was 28 and work closely with him. 29 Q. Okay. Okay usupervise all 29 Q. Okay. And it says you supervise all 20 Q. Okay. Must functions are not supervised 21 Q. Okay. Okay. What functions are not supervised 22 A. Okay. Must functions are not supervised 23 A. Let's see. September the 2nd of this 24 A. Mr. Dixon always kept track of all the 25 Q. Okay. And it says you supervise all 26 Q. Okay. Must functions are not supervised 27 A. No. Not really. I didn't approve of 28 A. No. Okay. Wat functions are not supervised 29 A. No. Okay. Wat functions are not super	10	that Kay knows what you're saying. All right?	10	A. Well, I report to my sheriff, and I also
13 A. I said I'm waiting. 14 Q. You're waiting? 15 A. Yes, sir. I'm ready. 16 Q. All right. Here's my question. Are you 17 employed? 18 A. Yes, sir. I am. 19 Q. By whom? 20 A. Pike County Sheriff's Office. 21 Q. And how long have you been employed by 22 the Pike County Sheriff's Department? 23 A. Let's see. September the 2nd of this 24 year, I'll be going into my 18th year, I do believe. Page 8 1 cases that we were currently working. 2 Q. And did you ever have direct contact with 3 the sheriff himself? 4 A. Of course. Yes. 5 Q. How and under what circumstances? 6 A. Well, we usually would meet couple times a a week to discuss cases that we were working on. Or 8 just to discuss general things that were happening 9 around the office — administrative things. 10 Q. We have — I'm sorry. I didn't mean to 11 speak over you. 12 We have marked a document earlier as 13 Exhibit 7, which I'm going to ask Emmett to put in 14 front of you. Have you seen Exhibit 7 previously? 15 A. Yes. Yes. I have. 16 Q. What is this? 17 A. Well, this is actually — it lays out my 18 job description. 19 Q. Okay. And it says you supervise all 10 functions of the sheriff's officie is in that correct? 21 A. Not exactly every function. But pretty 22 much so, yes. 23 Q. Okay. What functions are not supervised 24 A. Okay. 25 A. Well right new ait of 26 Q. All way up until about a 26 year ago. Until his departure. 27 Q. Okay. And in what way would you report 28 to Mr. Dixon? 29 A. Nell, this has changed since this lawsuit 29 A. Nell, this has changed since this lawsuit 29 A. Nell, this has changed since this lawsuit 29 A. Yes. I farel approve 20 Colay. And in what way would you report 21 A. Mr. Dixon always kept track of all the 22 on of ay. And in what way would you report 23 to Mr. Dixon? 24 A. That was all the way up until about a 25 year ago. Until his departure. 26 O. Kay. Dixon always kept track of all the 27 A. Nell, this has changed since this lawsuit 28 A. Nell, this has changed since this lawsuit 29 A. Well, this has changed since this la	11	A. I'm waiting.	11	report to the courts who I serve.
14 Q. You're waiting? 15 A. Yes, sir. I'm ready. 16 Q. All right. Here's my question. Are you 17 employed? 18 A. Yes, sir. I am. 19 Q. By whom? 19 Q. And how long have you been employed by 22 the Pike County Sheriff's Office. 21 Q. And how long have you been employed by 22 the Pike County Sheriff's Department? 23 A. Let's see. September the 2nd of this 24 year, I'll be going into my 18th year, I do believe. Page 8 1 cases that we were currently working. 2 Q. And did you ever have direct contact with 3 the sheriff himself? 4 A. Of course. Yes. 5 Q. How and under what circumstances? 6 A. Well, we usually would meet couple times 7 a week to discuss cases that we were working on. Or 8 just to discuss general things that were happening 9 around the office — administrative things. 10 Q. We have — I'm sorry, I didn't mean to 11 speak over you. 12 We have marked a document earlier as 13 Exhibit 7, which I'm going to ask Emmet to put in 14 front of you. Have you seen Exhibit 7 previously? 15 A. Yes. Yes. I have. 16 Q. What is this? 17 A. Well, this is actually — it lays out my 18 job description. 19 Q. Okay. And it says you supervise all 10 Q. What is sthis? 10 Q. Was List his? 11 A. Yes, sir, I did. 10 Q. What is have you been employed by 21 to discuss general things that were happening 31 around the office — administrative things. 32 D. We have — I'm sorry, I didn't mean to 33 Exhibit 7, which I'm going to ask Emmet to put in 44 front of you. Have you seen Exhibit 7 previously? 45 A. Yes. Yes. I have. 46 Q. Sure I'm talking about — do you knew working on Or 47 believe. Yes. I know him. 48 Q. Gray. And it says you supervise all 49 Q. Okay. And it says you supervise all 40 Q. Okay. And it says you supervise all 41 A. My immediate supervisor dichief deputy, chief and indicate that low under and pent an maned Dixon? 49 A. That was all the way up until about a gentleman named Dixon? 40 Q. Okay. And in what way would you report to to Mr. Dixon? 40 Mr. Dixon always kept track of all the 41 Mr. Dixon always kept track of all	12	Q. What's that?	12	Q. And I say "report." I mean, who's your
15 A. Yes, sir. I'm ready. 16 Q. All right. Here's my question. Are you 17 employed? 18 A. Yes, sir. I am. 19 Q. By whom? 20 A. Pike County Sheriff's Office. 21 Q. And how long have you been employed by 22 the Pike County Sheriff's Department? 22 A. Let's see. September the 2nd of this 24 year, I'll be going into my 18th year, I do believe. 24 year, I'll be going into my 18th year, I do believe. 25 A. Of course. Yes. 26 A. Well, back where currently working. 27 Q. And did you ever have direct contact with 3 the sheriff himself? 28 A. Of course. Yes. 29 A. Well, we usually would meet couple times 4 a week to discuss general things that were working on. Or 8 just to discuss general things that were happening 9 around the office administrative things. 29 Q. We have I'm sorry. I didn't mean to 11 speak over you. 20 Q. We have marked a document earlier as 12 Exhibit 7, which I'm going to ask Emmett to put in 4 front of you. Have you seen Exhibit 7 previously? 20 A. Well, this is actually it lays out my 15 job description. 20 Q. Okay. And it says you supervise all 6 Q. Okay. And it says you supervise all 6 Q. Okay. What is this? 30 Q. Okay. And it says you supervise all 6 Q. Okay. What is functions of the sheriff's office; is that correct? 2 A. Not exactly every function. But pretty 2 much so, yes. 20 Q. Okay. What intrements 2 in the correct? 2 in A. Not exactly every function. But pretty 2 in A. Not exactly every function. But pretty 2 in A. Okay.	13	A. I said I'm waiting.	13	immediate supervisor?
16 Q. All right. Here's my question. Are you 17 employed? 18 A. Yes, sir. I am. 19 Q. By whxn? 20 A. Pike County Sheriff's Office. 21 Q. And how long have you been employed by 22 the Pike County Sheriff's Department? 22 A. Let's see. September the 2nd of this 24 year, I'll be going into my 18th year, I do believe. 23 A. Let's see. September the 2nd of this 24 year, I'll be going into my 18th year, I do believe. 24 Page 8 Cases that we were currently working. 25 Q. And did you ever have direct contact with 3 the sheriff himself? 4 A. Of course. Yes. 5 Q. How and under what circumstances? 6 A. Well, we usually would meet couple times 7 a week to discuss general things that were happening 9 around the office administrative things. 10 Q. We have I'm sorry, I didn't mean to 11 speak over you. 11 Sexhibit 7, which I'm going to ask Emmett to put in 14 front of you. Have you seen Exhibit 7 previously? 15 A. Wes. Yes. I have. 16 Q. What is this? 17 A. Well, this is actually it lays out my 18 job description. 18 A. Yes, sir, I did. 20 Q. When was that? 21 A. That was all the way up until about a 2 year ago. Until his departure. 22 Q. Okay. And in what way would you report to a 2 yentleman named Dixxor? 24 A. That was all the way up until about a 2 year ago. Until his departure. 25 Q. Okay. And in what way would you report to a 2 year ago. Until his departure. 26 Q. Okay. And in what way up until about a 2 year ago. Until his departure. 27 Q. Okay. And in what way would you report to a 2 year ago. Until his departure. 28 A. Mr. Dixon? 29 A. Well, this has changed since this lawsuit has been filed. Wy role at the sheriff's office is constantly evolving. Can you be more specific? 4 Q. Sure. I'm talking about do you know our client, breek Myers? 4 A. Yes. Charlie Reeder so cousin, I do believe. Yes. I know him. 4 Q. How do you know Mr. Myers? 4 A. Well, hack when Charlie Reeder was sheriff he wanted me to partner up with Mr. Myers and work closely with him. 4 Q. Okay. So you knew Mr. Myers personally? 4 A. Not re	14	Q. You're waiting?	14	A. My immediate supervisor right now is our
16 Q. All right. Here's my question. Are you 17 employed? 18 A. Yes, sir. I am. 18 A. Yes, sir. I did. 29 gentleman named Dixon? 19 Q. By whon? 19 Q. When was that? 20 A. Pike County Sheriff's Office. 20 A. That was all the way up until about a 21 year ago. Until his departure. 21 to Mr. Dixon? 22 the Pike County Sheriff's Department? 22 A. That was all the way up until about a 21 year, I'll be going into my 18th year, I do believe. 24 year, I'll be going into my 18th year, I do believe. 25 A. Mr. Dixon always kept track of all the 27 A. Mr. Dixon always kept track of all the 28 A. Mr. Dixon always kept track of all the 28 A. Well, this has changed since this lawsuit 29 has been filed. My role at the sheriff's office is 29 constantly evolving. Can you be more specific? 40 Q. Sure. I'm talking about do you know 29 our client, Derek Myers? 20 A. Well, we usually would meet couple times 29 A. Well, we want under what circumstances? 20 A. Well, we usually would meet couple times 20 A. Yes. Charlie Reeder's cousin, I do 20 believe. Yes. I know him. 20 A. We have I'm sorry. I didn't mean to 21 speak over you. 21 didn't mean to 21 speak over you. 22 what is this? 23 A. Well, hack when Charlie Reeder was 25 sheriff, he wanted me to partner up with Mr. Myers 21 A. No. Not really. I didn't approve of 25 that type of relationship. 26 Capacity, have any experiences with Mr. Myers? 27 A. Not really. I didn't approve of 27 A. Not really. I didn't approve of 28 that type of relationship. 29 C. Okay. And it says you supervise all 20 C. All right. That's what I'm interested 20 much so, yes. 20 C. Okay. What functions are not supervised 21 in. A. Not exactly every function. But pretty 22 much so, yes. 20 C. Okay. What functions are not supervised 21 in. A. Okay.	15	A. Yes, sir. I'm ready.	15	chief deputy, Christopher Jones.
17 employed? 18 A. Yes, sir. I am. 19 Q. By whom? 20 A. Pike County Sheriff's Office. 21 Q. And how long have you been employed by 22 the Pike County Sheriff's Department? 23 A. Let's see. September the 2nd of this 24 year, I'll be going into my 18th year, I do believe. 25 A. Let's see. September the 2nd of this 26 to Mr. Dixon? 27 A. Mr. Dixon always kept track of all the 28 cases that we were currently working. 29 Q. And did you ever have direct contact with 30 the sheriff himself? 40 A. Of course. Yes. 50 Q. How and under what circumstances? 61 A. Well, we usually would meet couple times 62 a week to discuss cases that we were working on. 63 or a week to discuss cases that we were working on. 64 Q. We have — I'm sorry. I didn't mean to. 65 Q. We have — I'm sorry. I didn't mean to. 66 Q. We have — I'm sorry. I didn't mean to. 67 a week to fire. — administrative things. 68 Q. We have marked a document earlier as. 69 A. Well, this is actually — it lays out my. 60 Gokay. So you knew Mr. Myers? 61 A. Yes. Yes. I have. 61 Q. What is this? 62 Q. Mat it says you supervise all 63 Q. Okay. And it says you supervise all 64 A. Ot you. 65 Q. Okay. Mat functions are not supervised 65 A. Yes. I did during the Rhoden Gilley 66 A. Not exactly every function. But pretty. 67 A. Not exactly every function are not supervised 68 A. Yes. sir, I did. 69 Q. Okay. What functions are not supervised 79 A. Well, this is actually — it lays out my. 70 A. Well, this is actually — it lays out my. 71 A. Not exactly every function. But pretty. 72 A. Not exactly every functions are not supervised. 73 A. Okay.	16	Q. All right. Here's my question. Are you	16	Q. At some time, did you report to a
Q. By whom? A. Pike County Sheriff's Office. Q. And how long have you been employed by the Pike County Sheriff's Department? A. Let's see. September the 2nd of this year, I'll be going into my 18th year, I do believe. Page 8 cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Well, this is actually it lays out my job description. Q. What is this? A. Well, this is actually it lays out my job description. Q. Way. And it says you supervise all functions of the sheriff's office is that correct? A. More county Sheriff's Office. A. That was all the way up until about a year ago. thiti his departure. Q. Okay. And in what way would you report to Mr. Dixon? A. Mr. Dixon always kept track of all the Mr. Dixon? A. Mr. Dixon always kept track of all the Mr. Dixon? A. Mr. Dixon always kept track of all the Mr. Dixon? A. Mell, this has changed since this lawsuit to Mr. Dixon? A. Well, the shas changed since this lawsuit to Mr. Dixon? A. Well, the shas changed since this lawsuit to Mr. Dixon? A. Well, the shas changed since this lawsuit to Mr. Dixon? A. Well, that is as changed since this lawsuit to Mr. Dixon? A. Well, that has changed since this lawsuit to Mr. Dixon? A. Well, this has changed since this lawsuit to Mr. Dixon? A. Well, that has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally?	17		17	
A. Pike County Sheriff's Office. Q. And how long have you been employed by the Pike County Sheriff's Department? A. Let's see. September the 2nd of this year, I'll be going into my 18th year, I do believe. Page 8 cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or bits just to discuss general things that were happening around the office — administrative things. Q. We have — I'm sorry. I didn't mean to speak over you. Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Well, this is actually — it lays out my Schibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Well, this is actually — it lays out my Schibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Well, this is actually — it lays out my Schibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Well, this is actually — it lays out my Schibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Well, this is actually — it lays out my Schibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Well, this is actually — it lays out my A. No. Not really. I didn't approve of that type of relationship. Q. Okay. Did you ever serve any process on him? A. Yes. Yes. I show him. Q. Did you ever serve any process on him? A. Yes. I did during the Rhoden Gilley homicide trial. 21 Q. All right. That's what I'm interested in. 22 a. A. Okay.	18	A. Yes, sir. I am.	18	A. Yes, sir, I did.
the Pike County Sheriff's Department? A. Let's see. September the 2nd of this year, I'll be going into my 18th year, I do believe. Page 8 cases that we were currently working. A. Of course. Yes. O. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss general things that we were working on. Or in just to discuss general things that we were working. O. We have — I'm sorry. I didn't mean to speak over you. We have warked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Well, this is actually — it lays out my job description. O. What is this? A. Well, this is actually — it lays out my job description. O. What is says you supervise all functions of the sheriff's office; is that correct? A. Not exactly every function. But pretty much so, yes. O. Chay. And in what way would you report to Mr. Dixon? A. Mr. Dixon always kept track of all the to Mr. Dixon? A. Mr. Dixon always kept track of all the to Mr. Dixon always kept track of all the to Mr. Dixon? A. Mell, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? A. Well, this has changed since this document exit and the Mr. Myers? A. Well, back when	19	Q. By whom?	19	Q. When was that?
the Pike County Sheriff's Department? A. Let's see. September the 2nd of this year, I'll be going into my 18th year, I do believe. Page 8 cases that we were currently working. O. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. O. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss general things that we were working on. Or is just to discuss general things that we were working. O. We have — I'm sorry. I didn't mean to speak over you. Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Well, this is a actually — it lays out my job description. O. What is this? A. Well, this is actually — it lays out my job description. O. What is says you supervise all functions of the sheriff's office; is that correct? A. Not exactly every function. But pretty much so, yes. O. Okay. And in what way would you report to Mr. Dixon? A. Mr. Dixon always kept track of all the to Mr. Dixon always kept track of all the to Mr. Dixon? A. Mr. Dixon always kept track of all the to Mr. Dixon always kept track of all the to Mr. Dixon always kept track of all the to Mr. Dixon? A. Mr. Dixon always kept track of all the to Mr. Dixon always kept track of all the to Mr. Dixon always kept track of all the to Mr. Dixon always kept track of all the to Mr. Dixon always kept track of all the to Mr. Dixon always kept track of all the to Mr. Dixon always kept track of all the to Mr. Dixon always kept track of all the to Mr. Dixon always kept track of all the to Mr. Dixon always kept track of all the to Mr. Dixon always kept track of all the to Mr. Dixon always kept track of all the to Mr. Dixon always kept track of all the to Mr. Dixon always hept track of all the Mr. Myers? A. Well, this is actually and the office is constantly evolving. Can you be more specific? A. Well, this has changed since this lawauit to Mr. Myers? A. Well, this has changed since this lawauit to Mr. Myers? A. Well, this has changed	20	A. Pike County Sheriff's Office.	20	A. That was all the way up until about a
the Pike County Sheriff's Department? A. Let's see. September the 2nd of this year, I'll be going into my 18th year, I do believe. Page 8 cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office — administrative things. Q. We have — I'm sorry. I didn't mean to geak over you. We have marked a document earlier as speak over you. We have by our seen Exhibit 7 previously? A. Well, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Well, this has changed since this lawsuit has been filled. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about — do you know our client, berek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally? A. No. Not really. I didn't approve of that type of relationship. A. Well, this is actually — it lays out my job description. A. Well, this is actually — it lays out my job description. Page 9 A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific. A. Now hat is alweel and the devolving. Can you be mor	21	O. And how long have you been employed by	21	
A. Let's see. September the 2nd of this year, I'll be going into my 18th year, I do believe. Page 8 cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or yiust to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as 12 Q. What is this? A. Yes. Yes. I have. Q. What is this? A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? 4 Q. Sure. I'm talking about do you know our client, Derek Myers? 5 A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. 8 Q. How do you know Mr. Myers? 9 A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. 12 Q. Okay. So you knew Mr. Myers personally? 13 A. No. Not really. I didn't approve of that type of relationship. 14 Co. Okay. Did you ever, in your professional capacity, have any experiences with Mr. Myers? 15 A. Well, this is actually it lays out my good description. 16 Q. What is this? 17 A. Well, this is actually it lays out my good description. 18 Q. Did you ever serve any process on him? 19 Q. Okay. And it says you supervise all 20 functions of the sheriff's office; is that correct? A. Not exactly every function. But pretty muchso, yes. 21 A. Not pixell. That's what I'm interested in. 22 much so, yes. 23 Q. Okay. What functions are not supervised 24 A. Okay.			22	
Page 8 1 cases that we were currently working. 2 Q. And did you ever have direct contact with 3 the sheriff himself? 4 A. Of course. Yes. 5 Q. How and under what circumstances? 6 A. Well, we usually would meet couple times 7 a week to discuss cases that we were working on. Or 8 just to discuss general things that were happening 9 around the office administrative things. 10 Q. We have I'm sorry. I didn't mean to 11 speak over you. 12 We have been Exhibit 7 previously? 13 Exhibit 7, which I'm going to ask Emmett to put in 14 front of you. Have you seen Exhibit 7 previously? 15 A. Yes. Yes. I have. 16 Q. What is this? 17 A. Well, this is actually it lays out my 18 job description. 19 Q. Okay. And it says you supervise all 20 functions of the sheriff's office; is that correct? 21 A. Not exactly every function. But pretty 22 much so, yes. 24 A. Mr. Dixon always kept track of all the Page 9 A. Well, this has changed since this lawsuit 1 A. Well, this has changed since this lawsuit 1 A. Well, this has changed since this lawsuit 1 has been filed. My role at the sheriff's office is 2 constantly evolving. Can you be more specific? 4 Q. Sure. I'm talking about do you know our client, Derek Myers? 6 A. Yes. Charlie Reeder's cousin, I do 9 believe. Yes. I know him. 9 Q. How do you know Mr. Myers? 8 A. Well, back when Charlie Reeder was 9 A. Well, back when Charlie Reeder was 10 sheriff, he wanted me to partner up with Mr. Myers 11 and work closely with him. 12 Q. Okay. So you knew Mr. Myers personally? 13 A. No. Not really. I didn't approve of 14 that type of relationship. 15 Q. Okay. Did you ever, in your professional 16 Q. Did you ever, in your professional 17 A. Not really. 18 Q. Did you ever, in your professional 19 Q. Okay. And it says you supervise all 19 A. Yes. I did during the Rhoden Gilley 19 homicide trial. 20 Q. All right. That's what I'm interested 21 in. 22 in. 23 Q. Okay. What functions are not supervised 24 A. No. Aver.	23		23	
Page 8 1 cases that we were currently working. 2 Q. And did you ever have direct contact with 3 the sheriff himself? 4 A. Of course. Yes. 5 Q. How and under what circumstances? 6 A. Well, we usually would meet couple times 7 a week to discuss cases that we were working on. Or 8 just to discuss general things that were happening 9 around the office administrative things. 10 Q. We have I'm sorry. I didn't mean to 11 speak over you. 12 We have marked a document earlier as 13 Exhibit 7, which I'm going to ask Emmett to put in 14 front of you. Have you seen Exhibit 7 previously? 15 A. Yes. Yes. I have. 16 Q. What is this? 17 A. Well, this is actually it lays out my 18 job description. 19 Q. Okay. And it says you supervise all 20 functions of the sheriff's office; is that correct? 21 A. Not exactly every function. But pretty 22 much so, yes. 23 Q. Okay. What functions are not supervised 24 A. Well, this has changed since this lawsuit 2 has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? 2 constantly evolving. Can you be more specific? 3 constantly evolving. Can you be more specific? 4 Q. Sure. I'm talking about do you know our client, Derek Myers? 6 A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. 9 Q. How do you know Mr. Myers? 8 A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. 10 Q. Okay. So you knew Mr. Myers personally? 11 A. No. Not really. I didn't approve of that type of relationship. 12 Q. Okay. Did you ever, in your professional capacity, have any experiences with Mr. Myers? 14 A. Not really. 15 A. Not really. 16 Q. Did you ever serve any process on him? 17 A. Not really. 18 Q. Did you ever serve any process on him? 19 Q. Okay. And it says you supervise all 20 functions of the sheriff's office; is that correct? 21 A. Not exactly every function. But pretty 22 much so, yes. 23 Q. Okay. What functions are not supervised 24 In. Okay.			24	A. Mr. Dixon always kept track of all the
acases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Well, this is actually it lays out my gibb description. Q. Way. And it says you supervise all Q. Okay. Bay Chay. What functions are not supervised Max Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? A. Well, bas been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? A. Well, bas been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you know Mr. Myers personally? A. No. Not really. I didn't approve of that type of relationship. Q. Okay. Did you ever, in your professional capacity, have any experiences with Mr. Myers? A. Not really. A. Not really. A. Not really. Q. Did you ever serve any process on him? A. Yes. I did during the Rhoden Gilley homicide trial. Q. All right. That's what I'm interested much so, yes. Q. Okay. What functions are not supervised A. Okay.				<u> </u>
2 Q. And did you ever have direct contact with 3 the sheriff himself? 4 A. Of course. Yes. 5 Q. How and under what circumstances? 6 A. Well, we usually would meet couple times 7 a week to discuss cases that we were working on. Or 8 just to discuss general things that were happening 9 around the office administrative things. 10 Q. We have I'm sorry. I didn't mean to 11 speak over you. 12 We have marked a document earlier as 13 Exhibit 7, which I'm going to ask Emmett to put in 14 front of you. Have you seen Exhibit 7 previously? 15 A. Yes. Yes. I have. 16 Q. What is this? 17 A. Well, this is actually it lays out my 18 job description. 19 Q. Okay. And it says you supervise all 20 functions of the sheriff's office; is that correct? 21 A. Not exactly every function. But pretty 22 much so, yes. 23 Q. Okay. What functions are not supervised 10 A. Okay. Okay. Okay. 20 All right. That's what I'm interested 21 much so, yes. 22 in. 23 A. Okay. 24 Q. Sure. I'm talking about do you know our client, Derek Myers? 4 Q. Sure. I'm talking about do you know our client, Derek Myers? 4 Q. Sure. I'm talking about do you know our client, Derek Myers? 4 Q. Sure. I'm talking about do you know our client, Derek Myers? 6 A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. 9 Q. How do you know Mr. Myers? 9 A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. 11 Q. Okay. So you knew Mr. Myers personally? 12 A. No. Not really. I didn't approve of that type of relationship. 13 A. No. Not really. 14 La Course of the sheriff's office; is that correct? 15 A. Well, this is actually it lays out my 16 Course. 17 A. Well, back when Charlie Reeder's cousin, I do 18 Q. Okay. Did you know Mr. Myers? 19 A. No. Not really. I didn't approve of that type of relationship. 19 A. Yes. I did during the Rhoden Gilley homicide trial. 20 Q. All right. That's what I'm interested in. 21 Q. All right. That's what I'm interested in.				
the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally? A. No. No. Not really. I didn't approve of that type of relationship. Q. Okay. Did you ever, in your professional capacity, have any experiences with Mr. Myers? A. Well, this is actually it lays out my job description. Q. Okay. And it says you supervise all Q. Did you ever serve any process on him? A. Not exactly every function. But pretty much so, yes. Q. Okay. What functions are not supervised 3 constantly evolving. Can you be more specific? 4 Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally? A. No. Not really. Q. Okay. Did you ever, in your professional capacity, have any experiences with Mr. Myers? A. Not really. Q. Did you ever serve any process on him? A. Yes. I did during the Rhoden Gilley homicide trial. Q. All right. That's what I'm interested in. Q. Okay. A. Okay.				
A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Well, this is actually it lays out my We have it sharing? A. Well, this is actually it lays out my Q. Okay. And it says you supervise all Q. Okay. What is this? A. Not exactly every function. But pretty Q. Okay. A. Okay.		cases that we were currently working.		A. Well, this has changed since this lawsuit
Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or given to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Well, this is actually it lays out my Spok description. Q. What is this? A. Well, this is actually it lays out my Spok description. Q. Okay. And it says you supervise all A. Not exactly every functions are not supervised A. Okay. Our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. A. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was A. Well, back when Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was A. Well, back when Charlie R	2	cases that we were currently working. Q. And did you ever have direct contact with	2	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is
A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or a week to discuss general things that were happening giust to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to general things that were happening and work closely with him. Q. Okay. So you knew Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally? A. No. Not really. I didn't approve of that type of relationship. A. Yes. Yes. I have. Q. Okay. Did you ever, in your professional capacity, have any experiences with Mr. Myers? A. Not really. A. Not rea	2 3	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself?	2 3	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific?
a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally? A. No. Not really. I didn't approve of that type of relationship. Q. Okay. Did you ever, in your professional capacity, have any experiences with Mr. Myers? A. Well, this is actually it lays out my job description. Q. Okay. And it says you supervise all functions of the sheriff's office; is that correct? A. Not exactly every function. But pretty functions of yes. Q. Okay. What functions are not supervised A. Okay. A. Okay.	2 3 4	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes.	2 3 4	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know
gust to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. 10 We have marked a document earlier as sexhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Yes. Yes. I have. Q. What is this? A. Well, this is actually it lays out my job description. Q. Okay. And it says you supervise all plus days and so you know Mr. Myers? A. Not really. A	2 3 4 5	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances?	2 3 4 5	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers?
9 around the office administrative things. 10 Q. We have I'm sorry. I didn't mean to 11 speak over you. 11 speak over you. 12 We have marked a document earlier as 13 Exhibit 7, which I'm going to ask Emmett to put in 14 front of you. Have you seen Exhibit 7 previously? 15 A. Yes. Yes. I have. 16 Q. What is this? 17 A. Well, this is actually it lays out my 18 job description. 19 Q. Okay. And it says you supervise all 19 A. Yes. I did during the Rhoden Gilley 20 functions of the sheriff's office; is that correct? 21 A. Not exactly every function. But pretty 22 much so, yes. 2 A. Well, What functions are not supervised 2 A. Okay. 2 A. Well right. That's what I'm interested 2 in. 2 A. Okay. 3 A. Well, that's what I'm interested 2 in. 3 A. Okay.	2 3 4 5 6	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times	2 3 4 5 6	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do
Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Yes. Yes. I have. Q. Okay. Did you ever, in your professional Q. What is this? A. Well, this is actually it lays out my job description. Q. Okay. And it says you supervise all functions of the sheriff's office; is that correct? A. Not exactly every function. But pretty much so, yes. Q. Okay. What functions are not supervised 10 sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally? A. No. Not really. I didn't approve of that type of relationship. Q. Okay. Did you ever, in your professional capacity, have any experiences with Mr. Myers? A. Not really. A. Not really. A. Not really. A. Not really. A. Not experiences with Mr. Myers? A. Not really. A. Okay.	2 3 4 5 6 7	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or	2 3 4 5 6	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him.
speak over you. 11 and work closely with him. 12	2 3 4 5 6 7 8	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening	2 3 4 5 6 7 8	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers?
We have marked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Yes. Yes. I have. Q. Okay. So you knew Mr. Myers personally? A. No. Not really. I didn't approve of that type of relationship. Q. Okay. Did you ever, in your professional capacity, have any experiences with Mr. Myers? A. Well, this is actually it lays out my job description. Q. Okay. And it says you supervise all Q. Did you ever serve any process on him? Q. Okay. And it says you supervise all A. Not exactly every function. But pretty A. Nomicide trial. Q. All right. That's what I'm interested in. Q. Okay. A. Okay.	2 3 4 5 6 7 8	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things.	2 3 4 5 6 7 8	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was
Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Yes. Yes. I have. Q. What is this? A. Well, this is actually it lays out my job description. Q. Okay. And it says you supervise all Q. Okay. And it says you supervise all A. Yes. I did during the Rhoden Gilley A. Not exactly every function. But pretty Q. Okay. What I minterested Q. All right. That's what I'm interested in. Q. Okay. A. Okay.	2 3 4 5 6 7 8	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things.	2 3 4 5 6 7 8	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was
front of you. Have you seen Exhibit 7 previously? A. Yes. Yes. I have. Q. What is this? A. Well, this is actually it lays out my By the proviously? A. Well, this is actually it lays out my By the proviously? A. Well, this is actually it lays out my By the proviously? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive, have any experiences with Mr. Myers? A. Not really. Compactive have any experiences with Mr. Myers? A. Not really. Compactive have any experiences with Mr. Myers? A. Not really. Compactive have any experience	2 3 4 5 6 7 8 9	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you.	2 3 4 5 6 7 8 9	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him.
15 A. Yes. Yes. I have. 16 Q. What is this? 16 capacity, have any experiences with Mr. Myers? 17 A. Well, this is actually it lays out my 18 job description. 19 Q. Okay. And it says you supervise all 19 A. Yes. I did during the Rhoden Gilley 20 functions of the sheriff's office; is that correct? 21 A. Not exactly every function. But pretty 22 much so, yes. 23 Q. Okay. What functions are not supervised 24 A. Okay. 25 A. Okay.	2 3 4 5 6 7 8 9 10	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as	2 3 4 5 6 7 8 9 10	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally?
16 Q. What is this? 17 A. Well, this is actually it lays out my 18 job description. 19 Q. Okay. And it says you supervise all 20 functions of the sheriff's office; is that correct? 21 A. Not exactly every function. But pretty 22 much so, yes. 23 Q. Okay. What functions are not supervised 24 capacity, have any experiences with Mr. Myers? 26 A. Not really. 27 A. Not really. 28 Q. Did you ever serve any process on him? 29 A. Yes. I did during the Rhoden Gilley 20 homicide trial. 21 Q. All right. That's what I'm interested 22 in. 23 A. Okay.	2 3 4 5 6 7 8 9 10 11	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in	2 3 4 5 6 7 8 9 10 11 12	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally? A. No. Not really. I didn't approve of
A. Well, this is actually it lays out my job description. Q. Okay. And it says you supervise all functions of the sheriff's office; is that correct? A. Not really. A. Not really. A. Yes. I did during the Rhoden Gilley homicide trial. A. Not exactly every function. But pretty much so, yes. Q. Okay. What functions are not supervised A. Okay.	2 3 4 5 6 7 8 9 10 11 12	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in	2 3 4 5 6 7 8 9 10 11 12 13	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally? A. No. Not really. I didn't approve of that type of relationship.
job description. Q. Okay. And it says you supervise all functions of the sheriff's office; is that correct? A. Not exactly every function. But pretty much so, yes. Q. Did you ever serve any process on him? A. Yes. I did during the Rhoden Gilley homicide trial. Q. Did you ever serve any process on him? 20 homicide trial. 21 Q. All right. That's what I'm interested 22 in. Q. Okay. What functions are not supervised 23 A. Okay.	2 3 4 5 6 7 8 9 10 11 12 13	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously?	2 3 4 5 6 7 8 9 10 11 12 13 14	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally? A. No. Not really. I didn't approve of that type of relationship. Q. Okay. Did you ever, in your professional
19 Q. Okay. And it says you supervise all 19 A. Yes. I did during the Rhoden Gilley 20 functions of the sheriff's office; is that correct? 20 homicide trial. 21 A. Not exactly every function. But pretty 21 Q. All right. That's what I'm interested 22 much so, yes. 22 in. 23 Q. Okay. What functions are not supervised 23 A. Okay.	2 3 4 5 6 7 8 9 10 11 12 13 14	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Yes. Yes. I have.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally? A. No. Not really. I didn't approve of that type of relationship. Q. Okay. Did you ever, in your professional
functions of the sheriff's office; is that correct? A. Not exactly every function. But pretty much so, yes. Q. Okay. What functions are not supervised A. Not exactly every function. But pretty in. A. Okay.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Yes. Yes. I have. Q. What is this? A. Well, this is actually it lays out my	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally? A. No. Not really. I didn't approve of that type of relationship. Q. Okay. Did you ever, in your professional capacity, have any experiences with Mr. Myers?
21 A. Not exactly every function. But pretty 22 much so, yes. 23 Q. Okay. What functions are not supervised 21 Q. All right. That's what I'm interested 22 in. 23 A. Okay.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Yes. Yes. I have. Q. What is this? A. Well, this is actually it lays out my	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally? A. No. Not really. I didn't approve of that type of relationship. Q. Okay. Did you ever, in your professional capacity, have any experiences with Mr. Myers? A. Not really.
22 much so, yes. 23 Q. Okay. What functions are not supervised 23 A. Okay.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Yes. Yes. I have. Q. What is this? A. Well, this is actually it lays out my job description. Q. Okay. And it says you supervise all	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally? A. No. Not really. I didn't approve of that type of relationship. Q. Okay. Did you ever, in your professional capacity, have any experiences with Mr. Myers? A. Not really. Q. Did you ever serve any process on him? A. Yes. I did during the Rhoden Gilley
23 Q. Okay. What functions are not supervised 23 A. Okay.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Yes. Yes. I have. Q. What is this? A. Well, this is actually it lays out my job description. Q. Okay. And it says you supervise all functions of the sheriff's office; is that correct?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally? A. No. Not really. I didn't approve of that type of relationship. Q. Okay. Did you ever, in your professional capacity, have any experiences with Mr. Myers? A. Not really. Q. Did you ever serve any process on him? A. Yes. I did during the Rhoden Gilley homicide trial.
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Yes. Yes. I have. Q. What is this? A. Well, this is actually it lays out my job description. Q. Okay. And it says you supervise all functions of the sheriff's office; is that correct?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally? A. No. Not really. I didn't approve of that type of relationship. Q. Okay. Did you ever, in your professional capacity, have any experiences with Mr. Myers? A. Not really. Q. Did you ever serve any process on him? A. Yes. I did during the Rhoden Gilley homicide trial.
24 by you? 24 Q. Tell me what process you served on	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Yes. Yes. I have. Q. What is this? A. Well, this is actually it lays out my job description. Q. Okay. And it says you supervise all functions of the sheriff's office; is that correct? A. Not exactly every function. But pretty much so, yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally? A. No. Not really. I didn't approve of that type of relationship. Q. Okay. Did you ever, in your professional capacity, have any experiences with Mr. Myers? A. Not really. Q. Did you ever serve any process on him? A. Yes. I did during the Rhoden Gilley homicide trial. Q. All right. That's what I'm interested
	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	cases that we were currently working. Q. And did you ever have direct contact with the sheriff himself? A. Of course. Yes. Q. How and under what circumstances? A. Well, we usually would meet couple times a week to discuss cases that we were working on. Or just to discuss general things that were happening around the office administrative things. Q. We have I'm sorry. I didn't mean to speak over you. We have marked a document earlier as Exhibit 7, which I'm going to ask Emmett to put in front of you. Have you seen Exhibit 7 previously? A. Yes. Yes. I have. Q. What is this? A. Well, this is actually it lays out my job description. Q. Okay. And it says you supervise all functions of the sheriff's office; is that correct? A. Not exactly every function. But pretty much so, yes. Q. Okay. What functions are not supervised	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Well, this has changed since this lawsuit has been filed. My role at the sheriff's office is constantly evolving. Can you be more specific? Q. Sure. I'm talking about do you know our client, Derek Myers? A. Yes. Charlie Reeder's cousin, I do believe. Yes. I know him. Q. How do you know Mr. Myers? A. Well, back when Charlie Reeder was sheriff, he wanted me to partner up with Mr. Myers and work closely with him. Q. Okay. So you knew Mr. Myers personally? A. No. Not really. I didn't approve of that type of relationship. Q. Okay. Did you ever, in your professional capacity, have any experiences with Mr. Myers? A. Not really. Q. Did you ever serve any process on him? A. Yes. I did during the Rhoden Gilley homicide trial. Q. All right. That's what I'm interested in. A. Okay.

August 29, 2024

```
Page 11
                                                    Page 10
1
       Mr. Myers?
                                                                1
                                                                      from whom?
2
                   Okay. Well, I was asked that day,
                                                                2
                                                                            Α.
            Α.
                                                                                  That came from the prosecutor
3
       because we were short-handed, if I would work
                                                                3
                                                                      investigator and from Lieutenant Carver. They were
 4
       security at the front door of the common pleas
                                                                4
                                                                      operating under the direction of the prosecutor,
 5
       courthouse.
                                                                5
                                                                      which was Robert Junk.
6
             Q.
                   Who asked you to do that?
                                                                6
                                                                                  And do you know what involvement, if any,
7
            A.
                   To be honest, I don't know if it was the
                                                                7
                                                                      the sheriff had in that process?
8
       sheriff or if it was the chief deputy. I don't
                                                                8
                                                                            Α.
                                                                                  No, sir. I do not.
9
       remember. It's been a while back.
                                                                9
                                                                                  You do not?
                                                                            0.
10
                   Go on. Tell me what happened.
                                                               10
                                                                                  No, sir. I do not.
                                                                            Α.
                   I said, "Sure. No problem." Because,
11
            Α.
                                                               11
                                                                                  Did you ever have any direct discussions
12
       like I said, my job description is ever evolving.
                                                               12
                                                                      with the sheriff concerning the duties that you were
13
       And due to being short-staffed and stuff, we all have
                                                               13
                                                                      assigned on that day?
14
       to chip in. So I did. And I worked security at that
                                                               14
                                                                            Α.
                                                                                  No. There was nothing to discuss. I was
                                                                      asked to perform those duties and I did.
15
       day at the front door.
                                                               15
16
                   And Lieutenant Carver along with the
                                                               16
                                                                            Ο.
                                                                                  Okay. So what exactly did you do?
17
       prosecutor's investigator, Alan Wheeler, came to me
                                                               17
                                                                                  I did exactly what I was asked to do.
                                                                            Α.
18
       because the prosecutor along with Lieutenant Carver,
                                                               18
                                                                            0.
                                                                                  Which was?
19
                                                               19
       who was over court security at that time, gave me
                                                                            Α.
                                                                                  I worked security at the front desk -- at
                                                                      the front door.
20
       instructions, per the prosecutor, that when Mr. Myers
                                                               20
21
       was to arrive that I was to seize his cell phone and
                                                               21
                                                                            Q.
                                                                                  Correct.
22
       also give him a copy of an inventory of a search
                                                               22
                                                                            Α.
                                                                                  And I also followed the instruction from
23
       warrant that they had executed.
                                                               23
                                                                      the prosecutor and his investigator. And I seized
24
                   Okay. And that direction came to you
                                                               24
                                                                      Mr. Myers's cell phone. I served him with an
             0.
                                                    Page 12
                                                                                  Page 13 All right. Did you see any affidavit for
                                                                1
                                                                            Q.
1
       inventory list. And I also wrote on that inventory
                                                                      search warrant when you were assigned the duties --
                                                                2
 2
       list that we had taken his cell phone from him,
                                                                                  At the courthouse door?
                                                                            Α.
3
       because I wanted him to have some kind of receipt.
                  Let me show you what's been previously
                                                                4
                                                                            Ο.
                                                                                  Yes
 4
                                                                                  As security? No, sir. I did not.
                                                                            Α.
5
       marked as Exhibit 12.
                                                                6
                                                                                  Were you armed with a search warrant when
6
                   MR. ROBINSON: All right. Good to go,
                                                                7
                                                                      you seized the cell phone of Mr. Myers?
7
       Marc.
                                                                8
                                                                                  No. I was not. I don't need a search
8
                   MR. MEZIBOV: Thank you.
                                                                9
                                                                      warrant to seize a cell phone. I need a search
9
       By Mr. Mezibov:
                                                               10
                                                                      warrant to get into the cell phone. So when I
10
                   All right. Captain, do you have
             Q.
                                                               11
                                                                      followed the instruction from the prosecutor and his
11
       Exhibit 12 in front of you?
                                                               12
                                                                      investigator, I knew I wasn't breaking any laws.
12
             Α.
                   Yes. I do.
                                                                                  Okay. Let me ask you to look at
                                                               13
                                                                            Ο.
13
             0.
                   Does that say it's an affidavit for
14
       search warrant?
                                                               14
                                                                      Exhibit 13, please.
                                                               15
                                                                                  MS. SARK: It's attached to the back.
15
                   Yes, sir. It does.
            Α.
                                                               16
                                                                                  MR. ROBINSON: Confusing.
16
             Q.
                   And on the third page appears to be a
                                                               17
                                                                                  MS. SARK: Or, no, sorry. That was what
17
       signature of the applicant/affiant. Do you see that?
                                                               18
18
                   Yes. I do.
                                                               19
                                                                      By Mr. Mezibov:
19
                   And who's signature is that?
                                                               20
                                                                                  Do you have Exhibit 13 in front of you?
                                                                            Ο.
20
                   I can't, one hundred percent, say for
                                                               21
                                                                            Α.
                                                                                  Yes, sir. I do.
21
       sure. But it does look like it is an Alan Wheeler.
                                                               22
                                                                                  Is that what's called a search warrant?
22
             0.
                   All right. And have you seen this
                                                                            Ο.
                                                               23
                                                                            Α.
                                                                                  That's what it appears to be, yes, sir.
23
       document before?
                                                                                  And is that the search warrant that if
24
                   No, sir. Not until today.
            Α.
```

August 29, 2024

```
Page 15
                                                    Page 14
1
       you look on the second page is dated November 2nd,
                                                                      putting on that inventory list that -- his cell phone
                                                                1
 2
       2022?
                                                                2
                                                                      on it. Because I wanted him to have some type of
 3
             Α.
                   Okay. The date of what I'm looking at
                                                                      receipt. And I --
 4
       here looks like it is 11/2 of '22.
                                                                                 Did you ever exhibit or show to Mr. Myers
 5
             Ο.
                   Correct. And there's a judge's signature
                                                                5
                                                                      any document signed by the judge?
 6
       there?
                                                                6
                                                                                 No. Why would I? I didn't need a search
 7
                                                                7
                                                                      warrant to take and confiscate his phone.
             Α.
                   There is a signature there. I wasn't
                                                                                  Okay. Why did you not need a search
 8
       present.
                                                                8
                                                                           Ο.
 9
             Ο.
                   I can't read it either. Do you know who
                                                               9
                                                                      warrant to confiscate his phone?
10
       it is?
                                                               10
                                                                                  Because I don't need a search warrant to
11
                   To be honest with you, no, sir. I can't
                                                               11
                                                                      confiscate somebody's cell phone. I need a search
12
       tell you whose signature that is.
                                                               12
                                                                      warrant to get in their cell phone.
13
                   So tell me about your interaction with
                                                                                 All right. I heard your testimony. And
             Ο.
                                                              13
                                                                           Ο.
                                                                      I'm not quibbling with you.
       Mr. Myers on that day.
14
                                                               14
15
                                                              15
                                                                                  But I just want to understand. Is it the
             Α.
                   He came in, was being processed through
       security. He set his cell phone down. I told him
                                                                      policy of the sheriff's department to seize an
16
                                                               16
17
       that I was instructed to confiscate his cell phone,
                                                              17
                                                                      individual's cell phone without benefit of a search
18
       and I took it and told him I had another paper for
                                                              18
                                                                      warrant issued by a judge?
19
       him. I do believe he was a little perturbed. I'm
                                                               19
                                                                                  MS. SARK: Objection.
20
       not going to say upset but perturbed.
                                                               20
                                                                                  You can answer.
21
                   He turned around and walked outside. He
                                                               21
                                                                                  Sir, legally we can do it. And we do do
22
       had another gentleman with him of a heavyset build.
                                                               22
                                                                      that. And afterward we obtain a search warrant later
23
       And I remember I turned around behind me. I got the
                                                               23
                                                                      for its processing at BCI&I. Now until the Supreme
24
       inventory list. And I remember jotting down --
                                                               24
                                                                      Court changes that, that is what I follow.
                                                                                                                  Page 17
                                                    Page 16
1
                   All right. Did you have any other
                                                                                  MR. MEZIBOV: No. No. You're fine.
                                                                                  Okay. We'll get a copy of this.
 2
       involvement in this Rhoden matter or in the Derek
                                                                2
                                                                                  MS. SARK: We'll get a copy as well.
 3
       Myers's matter that we're discussing?
                                                                3
                   No. sir. I hadn't. No. I did not.
                                                                                  STENOGRAPHER: And will there be
 4
             Δ
                                                                4
 5
             Ω
                   Why don't we take a moment and --
                                                                5
                                                                      signature reserved?
 6
                   MR. MEZIBOV: Emmett, can we talk?
                                                                6
                                                                                  MS. SARK: So you can read the
 7
                   MR. ROBINSON: Sure.
                                                                7
                                                                      deposition. You can't change any of the deposition
 8
                   (Recess taken.)
                                                                      testimony, but if you believe something was taken
 9
                   MR. MEZIBOV: All right. Well, I told
                                                                      down incorrectly, you can note it at the end. Or we
10
       you this would be quick and dirty. I'm done. Sorry,
                                                              10
                                                                      can just waive your signature, which means you don't
11
       Captain. I know you were looking forward --
                                                               11
                                                                      want to read it. I'm going to recommend we waive if
                   THE WITNESS: Actually, sir, there's
12
                                                              12
                                                                      you're fine with that.
       nothing to apologize for. I've had one hour of sleep
                                                                                  THE WITNESS: I'm totally fine with
13
                                                              13
       in the past 24 hours, and I'm currently in the middle
14
                                                              14
                                                                      everything that transpired.
15
       of a rape case. This is why I'm dressed the way I am
                                                              15
                                                                                  MS. SARK: All right. We'll waive.
16
       today.
                                                               16
                                                                      Thank you.
                   MR. MEZIBOV: Well, I appreciate your
17
                                                               17
18
                                                               18
                                                                                  Thereupon, at 12:08 p.m., Thursday,
       time.
19
                   THE WITNESS: I got to go do some -- I
                                                              19
                                                                      August 29th, 2024, the deposition was completed.
20
                                                               20
       got to go catch a rapist.
21
                   MR. MEZIBOV: I'm done. Go get the
                                                               21
22
       rapist and we're done.
                                                               2.2
23
                   THE WITNESS: So if I felt short with
                                                               23
       you, I want to apologize. No disrespect, sir.
```

	Page 18
1	CERTIFICATE STATE OF OHIO :
2	STATE OF OHIO :
	COUNTY OF JACKSON :
3	
4	I, Kathryn R. Thorne, Shorthand Reporter and
5	Notary Public in and for the State of Ohio duly
6	commissioned and qualified, do hereby certify that
7	the transcript of James Burchett was taken by me and
8	before me at the time and place for the purpose
9	specified in the caption hereof.
10	I FURTHER CERTIFY that the foregoing
11	transcript of said testimony is a true and correct
12	transcript of the testimony given by the said witness
13	at the time and place specified herein.
14	I FURTHER CERTIFY that I am not a relative or
15	employee or attorney or counsel of any of the
16	parties, or financially interested directly or
17	indirectly in this action.
18	Given under my hand this 9th day of September, 2024
19 20	My Commission expires June 26, 2027
21	
22	Kathryn Thorne
	Kathryn Thorne
23	Court Reporter
	Notary Public-State of Ohio
24	